

Exhibit A

From: Dennis Rogers <dennis.rogers@omtcinc.com>
Sent: Saturday, March 26, 2022 3:30 PM
To: 'Eastlake, David R.'
Cc: 'McElvy, Meghan'; 'Sales, Travis'
Subject: Re: Rogers Involuntary Bankruptcy - Revised Agreed Order
Attachments: Revised Agreed Order for Trustee.pdf

Please see attached...

Thank you,

Dennis

On Mar 26, 2022, at 2:48 PM, Eastlake, David R. <david.eastlake@bakerbotts.com> wrote:

Dennis,

I just spoke to Meghan and understand you had some difficulty opening the attachment, so I'm attaching another copy of the revised agreed order in Word. Please let us know if you are unable to open this file.

Also, because you previously stated you were opposed to our motion and we stated your opposition in our motion filed with the court, this will need to be an agreed order, with all parties signing off on it. An unopposed order typically accompanies an unopposed motion, which we did not have here at the time of filing.

If the revised order is acceptable to you, please sign where indicated on the last page and scan back to us so that we may add your e-signature to the order. Once we've added all parties' e-signatures, we will upload the agreed order with the court and contact the judge's case manager to let her know that we have reached an agreement on the motion and request that the agreed order be entered by the court. We will copy on our correspondence with the court's case manager.

Thank you,

David

David R. Eastlake

Partner

Baker Botts L.L.P.

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<Agreed Order on Motion to Appoint Interim Trustee_Active_84057094_3.DOCX>

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 7
	§	
DENNIS JAMES ROGERS II,	§	Case No. 22-30500-7
	§	
Alleged Debtor.	§	(Involuntary Proceeding)

**AGREED ORDER GRANTING PETITIONING CREDITORS' EMERGENCY MOTION
FOR ENTRY OF AN ORDER (I) APPOINTING AN INTERIM TRUSTEE UNDER
11 U.S.C. § 303(G) AND (II) GRANTING EMERGENCY RELIEF
[RELATES TO DOCKET NO. 2]**

This matter coming before the Court upon the emergency motion (the "Emergency Motion")¹ filed by Steven A. Webster, Debra and Russell Van Cleve, and Angela Garbiso (collectively, the "Petitioning Creditors") for entry of an order, pursuant to sections 105(a) and

¹ Capitalized terms used but not otherwise defined herein shall have the same meanings as ascribed to them in the Emergency Motion.

303(g) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and Rule 2001 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (a) appointing an interim Chapter 7 trustee and (b) granting related relief; and it appearing that this Court has jurisdiction to consider the Emergency Motion pursuant to 28 U.S.C. § 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this involuntary chapter 7 case and the Emergency Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and, after due deliberation, the Court having determined that the relief requested in the Emergency Motion is in the best interests of the Alleged Debtor, the estate, its creditors, and all other parties in interest; and it appearing that proper and adequate notice of the Emergency Motion has been given and that no other or further notice is necessary; and the Court having reviewed the Emergency Motion and having heard the statements in support of the relief requested therein at any hearing before the Court; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Emergency Motion is **GRANTED** as set forth herein.
2. Pursuant to section 303(g) of the Bankruptcy Code, the United States Trustee shall immediately appoint an interim chapter 7 trustee (the “Interim Trustee”) to perform the duties set forth in sections 701 and 704 of the Bankruptcy Code.
3. Rogers shall cooperate in all respects with the Interim Trustee in implementing this Order, including without limitation, by providing complete and accurate information as requested by the Interim Trustee, and otherwise assist in the Interim Trustee’s management of the estate.
4. Rogers shall not interfere with the transition of control of the estate, including all assets and properties comprising the estate, to the Interim Trustee pursuant to this Order.

5. Effective immediately upon entry of this Order and until such time as an interim chapter 7 trustee is appointed to take control of and manage the estate, Rogers is and shall be prohibited from continuing to use, acquire, or dispose of property of the estate unless and until the Court orders otherwise; provided, however, that Rogers may continue to pay reasonable and necessary living expenses and reasonable costs to retain counsel for this case in an amount not to exceed \$5,000 in the aggregate, and Rogers shall take all appropriate and necessary actions to protect and preserve property of the estate pending the appointment of an interim chapter 7 trustee by the United States Trustee.

6. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

7. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implantation, interpretation and enforcement of this Order.

END OF ORDER

AGREED AS TO FORM AND SUBSTANCE:


By: _____
David R. Eastlake
Texas Bar No. 24074165
Meghan Dawson McElvy
Texas Bar No. 24065127
Travis James Sales
Texas Bar No. 17532080
Christopher E. Tutunjian
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Counsel for Petitioning Creditor Steven A. Webster

– and –

By: _____
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*Counsel for Petitioning Creditors Debra and
Russell Van Cleve and Angela Garbiso*

By:  _____
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Pro Se